



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAY 26 2004

Ref: EPR-ER

ACTION MEMORANDUM AMENDMENT

SUBJECT: Request for an Amendment to a Time Critical Removal Action at the Vermiculite Intermountain Site, Salt Lake City/County, Utah.

FROM: Floyd Nichols, On-Scene Coordinator
Emergency Response Team

THROUGH: Steve D. Hawthorn, Team Supervisor
Emergency Response Unit

for Douglas M. Skie, Director
Preparedness, Assessment & Emergency Response Programs

TO: Max H. Dodson, Assistant Regional Administrator
Office of Ecosystems Protection & Remediation

Site ID#: 08GA

Category of Removal: Time Critical, Fund-Lead

I. PURPOSE

The purpose of this ACTION MEMORANDUM AMENDMENT is to request an increase in the ceiling for the Removal Action at the Vermiculite Intermountain site (Site) located in Salt Lake City/County, Utah. The original Action Memorandum was signed on April 7, 2004, and included a 12-month & \$2 million exemption from the statutory limits (See Attachment A).

In the process of finding and removing the Libby Amphibole (asbestos) contamination at the Site, the U.S. Environmental Protection Agency (EPA) Region VIII faces several problems, the solution to which will prompt an increase in the total Removal costs:

- The Frank Edwards Building has more asbestos contamination within the building than was originally identified. Removal of this added amount of asbestos will result in additional costs for labor, equipment, and transportation/disposal.
- Completing the asbestos abatement within the Artistic Printing Company and the detailed cleaning of the large, multi-colored presses & ancillary equipment has prompted a significant increase in the estimate of labor hours required and a change in equipment that is being used to support the abatement.



II. SITE CONDITIONS AND BACKGROUND

The Site is located near 333 West 100 South, Salt Lake City, Utah. EPA has conducted several sampling events at or around the Site and inside the buildings surrounding the Site. Analysis of the samples showed the presence of Libby Amphibole (LA) asbestos fibers in significant concentrations in on- and off-Site soils and in dust collected from within various building interior work spaces and on equipment units inside buildings that are adjacent to the Site. Original work projections for the Site included excavation and/or removal of approximately 3,900 cubic yards of LA-contaminated dust, soils, and miscellaneous debris from the Site and surrounding properties, including the storage/switch building, the electrical substation parcel, the Artistic Printing Company Facility, the Frank Edwards Building, and Parking Lot (See Attachment 1 - Action Memorandum dated April 7, 2004 for additional information).

III. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Removal Actions

On April 14, 2004, EPA initiated the proposed actions listed in Attachment 1. Activities requiring the additional funds requested in this amendment are summarized below:

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. As EPA mobilized to the site, Artistic Printing continued daily operations, 5-days-per-week. EPA crews entered the facility at the end of the Company's workday - and accomplished various containment, abatement, and clearance activities throughout the night. On Thursday, May 20, the business shut down and the Time Critical Removal Action (TCRA) continued on a 24-hour-per-day basis thereafter. At that time approximately 35% of the building interior had been cleared of LA residue.

To enhance the efficiency of cleanup inside Artistic Printing, Emergency and Rapid Response (ERRS) mobilized specialized vacuum equipment from Libby, Montana. (Current plans call for subsequent use of this equipment during abatement activities inside the Frank Edwards Building, as well as at a "follow-on fund-lead TCRA" at another "Libby Sister" site which is only a few blocks away.) In addition, sufficient cleaning of the large, intricate equipment utilized by Artistic Printing is requiring substantially more labor hours than originally anticipated.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of the three cavernous rooms. Additional interior samples were collected to further delineate the interior spaces to be included in the pending fund - lead TCRA. Interior isolation and

containment walls have been partially erected. Additional work inside the building awaits successful clearance sampling inside Artistic Printing.

Completion of recent extent-of-contamination investigations inside the two large rooms prompted an increase of estimates for equipment and labor hours needed to complete the necessary cleanup and clearance activities.

B. Potential Future Actions

EPA continues to take ambient and personal air samples at the Site. In addition to the potential additional and/or changes in activities listed above for the Artistic and Franklin Buildings, future activities by the TCRA include:

AMPCO Parking Lot (owned by LaQuinta Corporation)

Core samples showed trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples have been collected to further define the contamination, scheduling of the TCRA for cleanup of the parking lot is pending.

PacifiCorp (parent company is Utah Power and Light)

EPA and PacifiCorp continue negotiating toward an Administrative Order on Consent for the cleanup of the UP&L substation parcel. Projected mobilization date for PacifiCorp's action is July of 2004.

C. Estimated Costs

Cost Estimate: A table containing the original and proposed cost estimates for the Amendment to the Removal project ceiling is shown below:

Extramural Costs:

	<u>Current Ceiling</u>	<u>Proposed Changes</u>	<u>Proposed Ceiling</u>
<u>Regional Allowance Costs:</u>			
ERRS/State Licensed ACM Sub-contractor	\$ 664,000	\$350,000	\$1,014,000
Transportation & Disposal Costs	\$ 15,000	\$	\$ 15,000
Volpe IAG (including sampling contractor)	\$ 689,000	\$ 13,000	\$ 702,000
USCG		\$ 30,000	\$ 30,000
Contingency (20%)	<u>\$ 273,600</u>	<u>\$ 78,000</u>	<u>\$ 351,600</u>
TOTAL, EXTRAMURAL COSTS	\$1,641,600	\$471,000	\$2,112,600

Intramural Costs

EPA's Direct Intramural Costs	\$ 164,160	\$ 50,640	\$ 214,800
Regional Indirect Cost (35%)	<u>\$ 632,016</u>	<u>\$164,850</u>	<u>\$ 796,866</u>
Estimated Total EPA Costs*	\$2,437,776	\$686,490	\$3,124,266

*The total EPA costs for this removal action, to be based on full-cost accounting practices, that will be eligible for cost recovery are estimated to be \$3,189,780. Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of total costs estimates nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

IV. RECOMMENDATION

This decision document represents the Amended Removal Action for the Vermiculite Intermountain Site, located at 333 West 100 South, Salt Lake City, Utah, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP criteria found at 40 C.F.R. 1 §300.415(b)(2) for a Removal Action, and I recommend your approval. The total project ceiling is estimated to be \$3,189,780 and of this, an estimated \$2,148,000 comes from the Regional removal allowance.

Approve: Max H. Dodson Date: 5/26/04
Max H. Dodson
Assistant Regional Administrator
Office of Ecosystems Protection
and Remediation

Disapprove: _____ Date: _____
Max H. Dodson
Assistant Regional Administrator
Office of Ecosystems Protection
and Remediation

Attachments:

Attachment A - Action Memorandum dated April 7, 2004

SUPPLEMENTAL DOCUMENTS

Support/reference documents which may be helpful to the reader and/or have been cited in the report may be found in the Administrative Record File at the Superfund Records Center for Region VIII EPA, 999 18th Street, Denver, Colorado 80202.